



OFFICIAL COMMENT

Alcoa

Warrick Operations
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January 19th, 2010

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Dept. Of Environmental Management
Commissioner's Office

Indiana Department of Environmental Management
Office of Commissioner
100 North Senate Avenue, Rm IGCN 1301
Indianapolis, Indiana 46204

JAN 25 2010

RE: Request for Time Extension for Comments on Antidegradation Rule

Dear Mr. Easterly,

As previously submitted, the IMA (Indiana Manufacturers Association) requested an extension for the comment period associated with the second notice draft of the antidegradation rule. As previously mentioned the draft was issued just prior to the holidays. Alcoa-Warrick Operations typically slows down and most everyone is on vacation at that time of the year. This year was no different. Since we lost over two weeks of time to review the "minor" changes and the changes and issues, in our opinion, are significant, we request an additional 30 days to ensure that the correct data and comments can be submitted to the agency to ensure that the agency has an opportunity to receive and evaluate all of the information necessary for this rule.

Additionally, we are very disappointed that the agency views IMA as a single entity when in fact they are representing numerous facilities with varied manufacturing functions. My hope was that we would not need to make an additional request on top of the request already submitted.

Secondly, there are minor changes in some of the language that has a great impact on the interpretation and application of the rule. These items need the proper attention and evaluation and that is why we are requesting additional time.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Denny Wene", enclosed within a large, loopy circular flourish.

Denny Wene
Senior Staff Environmental Engineer
Alcoa Warrick Operations
812-853-4625